

## **Reference 9**

TEXAS WATER COMMISSION  
Solid Waste Compliance Monitoring Inspection Report

## INSPECTION COVER SHEET

C.O. Use Only

TWC Dist. 126/6/86 APKEPA ID No. TXD086278058COMMERCIAL WASTE Facility        GOVT. Facility       NAME OF COMPANY FRC ENERGY CORP. dba FALCON REFININGMAILING ADDRESS 7322 SOUTHWEST FAWY HOUSTON, TEXASTel. 512-776-3115SITE LOCATION INTERSECTION of FM 2725 & BISHOP Rd.Tel. " " "COUNTY SAN PATRICIO TYPE OF INDUSTRY oil REFININGGENERATOR CLASSIFICATION: Industrial ☒ Municipal       

Part A Application submitted to the State? Yes ☒ No        To EPA? Yes        No        <sup>UNK.</sup>  
 Affidavit of Exclusion submitted to the State? Yes ☒ No         
 Was a written exclusion granted by TWC? Yes        No ☒ If yes, Date         
 Will this facility require a permit? Yes        No ☒

CURRENT WASTE MANAGEMENT (Haz.-"H", Class I NonHaz.-"NH", Class II-"II", Class III-"III")

Generator NH, H, II Treatment        Storage NH Disposal NH, II Transporter       HW Exemptions(check): 90-Day Storage        Other       claimed by GENERATOR \*SQG ☒ : Total HW Generation Per Month: <100 kg.        100-1000 kg. ☒

H W Facilities (circle appropriate codes): C T SI WP LT LF I TT TR WDW O

N H Facilities (circle appropriate codes): (C) (T) SI WP LT LF I TT TR WDW OAnomalies in the above information will be addressed by: (a) Enforcement in progress       ,  
(b) Central Office ☒, (c) District Office       , (d) Owner/Operator       .Type of Inspection (circle): (EV) EB EC CL GW (SA) CD FO OT FE SQ SWInspector's Name and Title CARLTON STANLEY, Field INVESTIGATORInspection Participants CLAUDE RICHEY, PLANT MANAGER, MR. SCHLECHTER, CONSULTANTDate(s) of Inspection 3/12/86Approved: *Cl. V8*  
District ManagerSigned: *Carlton H. Stanley* 6-5-86  
Inspector Date

\* SQG- Small quantity generator, &lt;1000 kg. of hazardous waste per month.

TEXAS WATER COMMISSION  
Solid Waste Inspection Report  
CONTENTS SHEETCOMPANY NAME FALCON REFINING

- ☒ 1. Code Sheet (0814)  
☒ 2. Inspection Cover Sheet  
☐ 3. Special Inspection Cover Sheet (HB.2358)  
☒ 4. Generators Checklist  
☐ 5. Small Quantity Generator Checklist  
☐ 6. General Facilities Checklist  
☐ \*7. Component Facility Checklists
- ☒ A. Containers (C)
  - ☒ B. Tanks (T)
  - ☐ C. Surface Impoundments (SI)
  - ☐ D. Waste Piles (WP)
  - ☐ E. Land Treatment (LT)
  - ☐ F. Landfills (LF)
  - ☐ G. Incinerators (I)
  - ☐ H. Thermal Treatment (TT)
  - ☐ I. Chemical, Physical, or Biological Treatment (TR)
  - ☐ J. Other (O)
- ☐ 8. Closure and Post-Closure Checklist ☐ Closure-In-Progress Checklist  
☐ 9. Groundwater Monitoring Checklist  
☒ 10. Notice of Violation (NOV) Letter  
☒ 11. Interoffice Memorandum (IOM)  
☒ 12. Registration  
☒ 13. Maps, Plans, Sketches  
☐ 14. Photographs/Slides  
☐ 15. Other (describe) \_\_\_\_\_

\* If a required Checklist is omitted, explain: SCG CHECKLIST IS NOT BEINGSUBMITTED DUE TO QUESTIONABLE SCG STATUS

GENERATORS CHECKLISTSection A - Notification and Waste Determination (335.6, .62, .63)

\*\*\*

1. Has generator completed an appropriate hazardous waste determination for each solid waste produced? YES      NO ✓
2. Check the method used for determination :
- a. Listed as a hazardous waste in 40 CFR Part 261, Subpart D.      SEE COMMENTS
- b. Process or materials knowledge.
- c. Tested for characteristics as identified in 40 CFR Part 261, Subpart C (If equivalent test method is used, attach a copy).

NOTE: If a hazardous determination has not been made or appears to be incorrect, the inspector should obtain a sample of the waste for analysis and explain in comments.

3. Has the facility received an EPA ID number? N/A      YES ✓ NO
4. Is notification of waste streams generated correct? SEE COMMENTS } YES      NO ✓
5. Do all waste management (TSD) methods in use agree with Registration? } YES      NO ✓
6. Does this facility generate, treat, store, or dispose of PCB wastes? YES      NO ✓  
If yes, describe storage and disposition:

7. Does this facility generate used oils ? YES ✓ NO       
If yes, describe storage and disposition:

STORED IN SLOP OIL TANKS - SOLD OR RECLAIMED

8. Does this facility generate spent solvents ? YES ✓ NO       
If yes, describe storage and disposition:

MINOR AMOUNTS OF SOLVENTS USED IN THE LAB ARE PUT INTO SLOP OIL TANK

9. Does this facility utilize sumps in the management of hazardous waste? If yes, describe use: YES      NO ✓

\*\*\* An entry in this column indicates corrective action/response is needed

09 003

Section B - Special Conditions (335.75)

1. If generator has received from or transported to a **foreign** entity any hazardous waste, has the appropriate notice been filed with the EPA Regional Administrator?
2. Was the waste manifested and signed by the foreign consignee?
3. Has confirmation of waste transport out of the country been received by the generator?

\*\*\*

N/A ☒ YES \_\_\_ NO \_\_\_

N/A ☒ YES \_\_\_ NO \_\_\_

N/A ☒ YES \_\_\_ NO \_\_\_

Section C - Recordkeeping and Reporting (335.9, .10, .13, .70-71)

1. Does the generator maintain the following records and reports (if applicable) for the necessary three years?

SEE COMMENTS

- a. Shipping Manifests
- b. Monthly off-site shipment summaries
- c. Monthly on-site land disposal summaries . . . . .
- d. Monthly waste receipt summaries
- e. Tests and analyses
- f. Annual reports

N/A \_\_\_ YES \_\_\_ NO \_\_\_

N/A \_\_\_ YES \_\_\_ NO \_\_\_

N/A \_\_\_ YES \_\_\_ NO \_\_\_

N/A \_\_\_ YES \_\_\_ NO \_\_\_

N/A \_\_\_ YES \_\_\_ NO \_\_\_

N/A \_\_\_ YES \_\_\_ NO \_\_\_

2. Has generator submitted **exception reports** to TWC for any original (white) copies of manifests not received back?
3. Have any spills, unauthorized discharges or threats of such discharges occurred?

N/A ☒ YES \_\_\_ NO \_\_\_

YES ☒ NO \_\_\_

If yes, have they been reported?(335.4, .453) SEE COMMENTS

N/A \_\_\_ YES \_\_\_ NO ☒

Have they been remedied?(335.453) Explain.

N/A \_\_\_ YES \_\_\_ NO ☒

+++ IF GENERATOR DISPOSES OF WASTES ON-SITE ONLY, WRITE N/A IN SECTION D+++

Section D - Pretransport and Manifest Requirements (335.61-68)

1. Identify primary off-site disposal facilities:

NO RECENT off-SITE SHIPMENTS

2. Are off-site disposal facilities permitted or operating under interim status standards?

N/A ☒ YES \_\_\_ NO \_\_\_

3. Are TWC manifests properly completed?

N/A ☒ YES \_\_\_ NO \_\_\_

++++ STOP & SIGN HERE IF FACILITY QUALIFIES AS A SMALL QUANTITY GENERATOR +++++

Signed: \_\_\_\_\_

SGG STATUS UNDETERMINED

09 004

Section D - (Continued)

COMPANY NEEDS TO MAKE WASTE DETERMINATIONS

4. Do containers used to hold waste(s) meet DOT packaging requirements (49 CFR Parts 173, 178, 179) before being offered for transport (if circumstances observed)? <sup>NOT</sup> ~~OBSERVED~~ N/A ☐ YES ☐ NO ☐
5. Does generator label and mark each package in accordance with 49 CFR Part 172 (if circumstances observed)? N/A ☐ YES ☐ NO ☐
6. Is each container of 110 gallons or less marked with the required hazardous waste warning label? N/A ☐ YES ☐ NO ☐
7. Does generator placard off-site waste shipments in accordance with DOT regulations (49 CFR Part 172, Subpart F) (if circumstances observed)? N/A ☐ YES ☐ NO ☐

Section E - Accumulation Time Exemption (335.59)

Note: A facility may accumulate and store hazardous wastes in containers or tanks for up to 90 days without a permit.

1. Is the beginning date of Accumulation Time clearly indicated on each container? N/A ☐ YES ☐ NO ☐
2. Is each container or tank clearly labeled or marked with the words "Hazardous Waste"? N/A ☐ YES ☐ NO ☐

Note: Attach a Container Storage Area Checklist for each container storage area.

Note: Attach a Tanks Checklist for each tank or each group of similar tanks.

Note: If this is a T/S/D Facility, proceed to General Facilities Checklist.

COMMENTS SHEET

Section A 1(1&2) THE COMPANY HAS NOT MADE HAZARDOUS WASTE DETERMINATIONS ON THE NUMEROUS DRUMS OF UNKNOWN MATERIALS ON SITE. Additionally the company GENERATED & DISPOSED ON-SITE COOLING SLUDGE W/OUT MAKING A HAZARDOUS WASTE DETERMINATION. I COLLECTED A SAMPLE OF THE COOLING TOWER SLUDGE WHICH TURNED OUT TO BE NON-HAZARDOUS ALTHOUGH THE MATERIAL CONTAINED HIGH LEVELS OF TOTAL CHROMIUM.

Section A 1(4&5) THE COMPANY DOES NOT HAVE THE FOLLOWING WASTE MATERIALS ON THE N.O.R. DAF FLOTT, API SEPARATOR SLUDGE, COOLING TOWER SLUDGE, LAB WASTES <sup>CWS</sup> MISC. DRUMS OF UNKNOWN MATERIALS, & PLANT REFUSE.

THE COMPANY IS CURRENTLY USING TWO TANKS FOR THE STORAGE OF SPENT CAUSTIC; THE N.O.R. INDICATES THAT ONLY ONE TANK IS BEING USED. ALSO THE AREAS OF COOLING TOWER SLUDGE & PLANT REFUSE DISPOSAL ARE NOT ON THE N.O.R. AS WELL AS DRUM STORAGE AREAS.

Section C 1(1) THE COMPANY HAS BEEN DELINQUENT IN THE SUBMISSION OF ANNUAL & MONTHLY REPORTS.

Section C 1(3) THE COMPANY DISPOSED OF COOLING TOWER SLUDGES ON-SITE WHICH CONTAIN HIGH LEVELS OF CHROMIUM. NO RUNOFF CONTROLS ARE PROVIDED.

ADDITIONALLY THERE ARE SOME DRUMS WHICH HAVE LEAKED UNKNOWN MATERIALS ONTO THE GROUND.

## TWC Solid Waste Inspection Report

TWC Reg. No. 31288Reg. Facility No. 01 <sup>1</sup>/<sub>2</sub> UNNAMEDTANKS CHECKLIST2 tanksClass of Waste ( NH )Use of Tank (check): Treatment      Storage ✓Type of Waste: SPENT CAUSTICType of Tank (check): Elevated      On-ground ✓ Below-grade      Underground     **NOTE:** Underground storage tanks are generally not being granted permit exemptions.Describe Tank construction: STEEL; weldedSection A - General Operating Requirements

\*\*\*

1. Is there evidence of ruptures, leaks, corrosion, or Tank failure? NO ✓ YES     

2. If the Tank is uncovered:

Is there 2 ft. of freeboard, an adequate containment dike,  
a drainage control system, or a diversion structure? N/A ✓ YES      NO     Describe:     

3. If the Tank is continuous-feed:

Is there a feed cutoff or bypass to standby Tank? N/A      YES      NO ✓Section B - Waste Analyses

1. If the Tank is used to treat or store significantly different wastes:

\*a. Are waste analyses and trial treatment  
or storage tests done on these different wastesor  
Is there written, documented information  
on similar treatment or storage of similar wastes?N/A ✓ YES      NO     \*b. Are records available of these  
wastes analyses in the operating record?N/A ✓ YES      NO     

\* Not applicable to Tanks under the 90-Day Storage Exemption.

\*\*\* An entry in this column indicates corrective action/response is needed.



### Section C - Tank Inspections

\*\*\*

1. Are the following items (if present) inspected at least daily:

- |   |   |                              |                             |
|---|---|------------------------------|-----------------------------|
| a. Discharge control equipment (e.g. waste feed cut-off, bypass, and/or drainage system)? | N/A <input checked="" type="checkbox"/> | YES <input type="checkbox"/> | NO <input type="checkbox"/> |
| b. Monitoring equipment (pressure & temperature gauges, etc.)?                            | N/A <input checked="" type="checkbox"/> | YES <input type="checkbox"/> | NO <input type="checkbox"/> |
| c. Data gathered from monitoring equipment?   | N/A <input checked="" type="checkbox"/> | YES <input type="checkbox"/> | NO <input type="checkbox"/> |
| d. Level of waste in each <u>uncovered</u> tank?  | N/A <input checked="" type="checkbox"/> | YES <input type="checkbox"/> | NO <input type="checkbox"/> |

2. Are the following items inspected at least weekly:

- |   |  |                              |                             |
|---|--|------------------------------|-----------------------------|
| a. Construction materials of tank for corrosion and leaks?                                  |  | YES <input type="checkbox"/> | NO <input type="checkbox"/> |
| b. Construction materials of discharge confinement structures (dikes) for erosion or leaks? |  | YES <input type="checkbox"/> | NO <input type="checkbox"/> |

\*3. Is a written inspection schedule kept at the site?

	N/A <input checked="" type="checkbox"/>	YES <input type="checkbox"/>	NO <input type="checkbox"/>
--	---	------------------------------	-----------------------------

\*4. Are adequate Tank inspection logs maintained for the necessary three years?

	N/A <input checked="" type="checkbox"/>	YES <input type="checkbox"/>	NO <input type="checkbox"/>
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### Section D - Special Requirements

1. Are ignitable and reactive wastes handled in accordance with the special requirements of TAC 335.266:

- |   |   |                              |                             |
|---|---|------------------------------|-----------------------------|
| a. Rendered non-ignitable or non-reactive<br><u>or</u><br>Protected from sources of ignition or reaction?<br>(N/A if the Tank is used solely for emergencies) | N/A <input checked="" type="checkbox"/> | YES <input type="checkbox"/> | NO <input type="checkbox"/> |
|---|---|------------------------------|-----------------------------|

- |   |   |                              |                             |
|---|---|------------------------------|-----------------------------|
| b. Compliant with the National Fire Protection Association buffer zone requirements for <u>covered</u> tanks? | N/A <input checked="" type="checkbox"/> | YES <input type="checkbox"/> | NO <input type="checkbox"/> |
|---|---|------------------------------|-----------------------------|

2. If the Tank is used to hold incompatible wastes:

Is the Tank washed prior to placement of wastes incompatible with previously stored wastes?	N/A <input checked="" type="checkbox"/>	YES <input type="checkbox"/>	NO <input type="checkbox"/>
---	---	------------------------------	-----------------------------

Tank Capacity & Dimensions: 1 tank 300 bbl full of spent caustic  
1 tank 250 bbl w/ approximately 150 bbls of spent caustic

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

TWC Solid Waste Inspection Report  
(TAC 335.241-247)  
CONTAINER STORAGE AREA CHECKLIST

TWC Reg. No. 31288  
Reg. Facility No. —  
Class of Wastes (?)

NOTE: TAC rules 335.241-247 apply to interim status and 90-Day Storage exempt facilities.

\*\*\*

1. Are containers in good condition? YES ☐ NO ☒
2. Are the containers compatible with the wastes being stored? YES ☒ NO ☐
3. Are containers kept closed and stored in a safe manner? YES ☐ NO ☒
4. Are containers inspected weekly for leakage and deterioration? YES ☐ NO ☒
5. Are containers holding ignitable or reactive wastes kept at least 15 meters (50 ft.) from the facility's property line? N/A ☐ YES ☒ NO ☐
6. Are containers holding incompatible wastes separated by a physical barrier or sufficient distance? N/A ☒ YES ☐ NO ☐
7. Does the storage area have containment protection? YES ☐ NO ☒

8. Describe the Container Storage Area using comments sheet and/or photos:

THE COMPANY DOES NOT HAVE A DESIGNATED DRUM STORAGE AREA  
ON THE REGISTRATION. SEE GENERAL COMMENTS & FACILITY MAP.

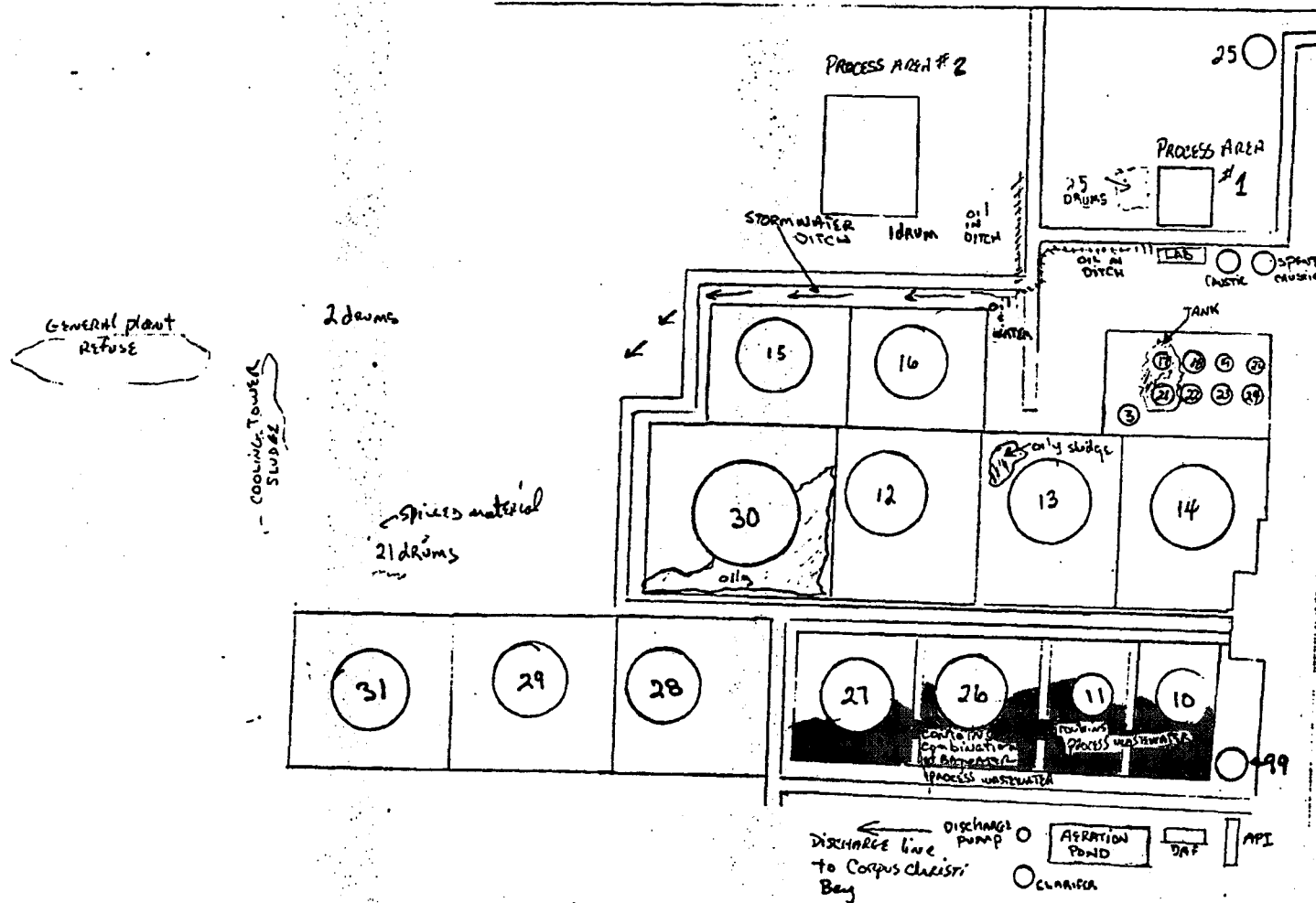
\*\*\* An entry in this column indicates corrective action/response is needed.

FALCON REFINING  
FRC Energy Company  
 Permit No. WQ 02142  
 SW REGISTRATION NO. 31288

8

1 2

Office  
 FM 2725



WETLANDS

09 010



GC/MS ANALYSIS REPORT  
EPA PRIORITY POLLUTANTS

HOGBERG DATE: 4/14/86

TDM SAMPLE NUMBER: EHL-727  
TWC SAMPLE NUMBER: SW 04258

SAMPLE TYPE: SOIL

SAMPLE CONDITION: 10 MIT

DETECTION LIMITS ARE APPROXIMATE

## ACID EXTRACTABLES IN (CHECK ONE) ( ) MICROGRAMS/LITER (✓) MILLIGRAMS/KILOGRAM:

NAME	AMT	NAME	AMT	NAME	AMT
PHENOL	<LS	4-CHLORO-3-CRESOL	<LS	4-NITROPHENOL	<30
CHLOROPHENOL	↓	2,4,6-TRICHLOROPHENOL	↓	2,6-DINITRO-3-CRESOL	↓
2-NITROPHENOL	↓	2,4-DINITROPHENOL	<30	PENTACHLOROPHENOL	↓
2,4-DICHLOROPHENOL	↓	2,4-DINITROPHENOL	↓		

## BASE NEUTRAL EXTRACTABLES IN (CHECK ONE) ( ) MICROGRAMS/LITER (✓) MILLIGRAMS/KILOGRAM:

NAME	AMT	NAME	AMT	NAME	AMT
N-NITROSO-N-DIMETHYLAMINE	<LS	ACENAPHTHYLENE	<LS	FLUORANTHENE	<LS
bis-(2-CHLOROETHYL) ETHER	↓	DIMETHYL PHTHALATE	↓	PYRENE	↓
1,3-DICHLOROBENZENE	↓	2,6-DINITROTOLUENE	↓	BENZIDINE	↓
1,4-DICHLOROBENZENE	↓	ACENAPHTHENE	↓	CUTYL BENZYL PHTHALATE	↓
1,2-DICHLOROBENZENE	↓	2,4-DINITROTOLUENE	↓	BENZ(a)ANTHRACENE	↓
bis-(2-CHLOROISOPROPYL) ETHER	↓	FLUORENE	↓	CHRYSENE	↓
HEXACHLOROETHANE	↓	4-CHLOROPHENYL PHENYL ETHER	↓	3,3'-DICHLOROBENZIDINE	↓
N-NITROSO-DI-N-PROPYLAMINE	↓	DICHTYL PHTHALATE	↓	bis-(2-ETHYLHEXYL) PHTHALATE	↓
NITROBENZENE	↓	DIPHENYLAMINE	↓	DI-n-OCTYL PHTHALATE	↓
ISOPHORONE	↓	N-NITROSO-1-PHENYLAMINE	↓	BENZO(g)FLUORANTHENE	↓
bis-(2-CHLOROETHOXY)METHANE	↓	1,2-DIPHENYLHYDRAZINE	↓	BENZO(k)FLUORANTHENE	↓
1,2,4-TRICHLOROBENZENE	↓	4-ISOPROPENYL PHENYL ETHER	↓	BENZO(k)PYRENE	↓
NAPHTHALENE	↓	HEXACHLOROBIENZYNE	↓	INDENO(1,2,3-cd)PYRENE	↓
HEXACHLOROBUTADIENE	↓	PHENANTHRENE	↓	DIBENZO(a,h)ANTHRACENE	↓
HEXACHLOROCYCLOPENTADIENE	↓	ANTHRACENE	↓	BENZO(ghi)PERYLENE	↓
2-CHLORONAPHTHALENE	↓	DI-n-BUTYL PHTHALATE	↓		

## PESTICIDES IN (CHECK ONE) ( ) MICROGRAMS/LITER (✓) MILLIGRAMS/KILOGRAM:

NAME	AMT	NAME	AMT	NAME	AMT
alpha-BHC	<LS	ALDRIN	<LS	BETA-ENDOSULFAN	<30
gamma-BHC	↓	4,4'-DDE	↓	ENDOSULFAN SULFATE	↓
BETA-BHC	↓	DELDRIN	↓	ENDRIN	↓
delta-BHC	↓	4,4'-DDD	↓	alpha-ENDOSULFAN	↓
HEPTACHLOR	↓	4,4'-DDT	↓	HEPTACHLOR EPOXIDE	↓
ENDRIN ALDEHYDE	↓				

## VOLATILE ORGANICS IN (CHECK ONE) ( ) MICROGRAMS/LITER ( ) MILLIGRAMS/KILOGRAM:

NAME	AMT	NAME	AMT	NAME	AMT
CHLOROMETHANE	---	1,2-DICHLOROETHANE	---	1,1,2-TRICHLOROETHANE	---
BROMOMETHANE	---	CARBON TETRACHLORIDE	---	2-CHLOROETHYL VINYL ETHER	---
VINYL CHLORIDE	---	PROPODICHLOROMETHANE	---	TRICHLOROETHYLENE	---
CHLOROETHANE	---	BENZENE	---	BROMOFORM	---
TRICHLOROFLUOROMETHANE	---	DIPROPODICHLOROMETHANE	---	TOLUENE	---
CHLOROFORM	---	1,1,1-TRICHLOROETHANE	---	ETHYLBENZENE	---
METHYLENE CHLORIDE	---	1,2-DICHLOROPROPANE	---	1,1,2,2-TRICHLOROETHANE	---
1-DICHLOROETHYLENE	---	trans-1,3-DICHLOROPROPYLENE	---	TETRACHLOROETHYLENE	---
1,1-DICHLOROTHANE	---	cis-1,3-DICHLOROPROPYLENE	---	CHLOROFORM	---
trans-1,2-DICHLOROETHYLENE	---				

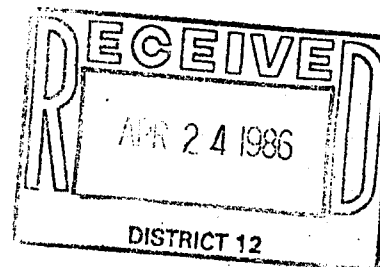
TENTATIVE IDENTIFICATION OF THE TEN LARGEST NON-PRIORITY POLLUTANT PEAKS BY COMPARISON WITH EPA/NIH MASS SPECTRAL LIBRARY. QUANTITATION AS DIO-ANTHRACENE IS PROVIDED, AND THE VALUES SHOULD BE REGARDED AS APPROXIMATE.

TENTATIVE  
COMPOUND  
IDENTIFICATIONAPPROXIMATE CONCENTRATIONS:  
AS D-10 ANTHRACENE  
( ) MICROGRAMS/LITER  
(✓) MILLIGRAMS/KILOGRAM

x-thajene

5

## COMMENTS AND OTHER REQUESTED ANALYSES:

TRACE OF OIL C<sub>15</sub>-C<sub>25</sub>

SIGNATURE

DATE

Richard A. Albert

4/17/86

~~500~~  
3100  
1500  
2300  
2900  
2800  
2000  
22000  
1200

CARL HOGBERG DATE: 4/14/86

TOH SAMPLE NUMBER EN6-726  
TWC SAMPLE NUMBER SW04257

\* DETECTION LIMITS ARE APPROXIMATE

SAMPLE TYPE: SOLID WASTE

SAMPLE CONDITION: INTACT

ACID EXTRACTABLES IN (CHECK ONE) ( ) MICROGRAMS/LITER (✓) MILLIGRAMS/KILOGRAM:

NAME	AMT	NAME	AMT	NAME	AMT
PHENOL	<340	4-CHLORO-3-CRESOL	<340	4-NITROPHENOL	<480
CHLOROPHENOL	↓	2,4,6-TRICHLOROPHENOL	↓	2,6-DINITRO-2-CRESOL	↓
2-NITROPHENOL	↓	2,4-DIMETHYLPHENOL	↑ trace	PENTACHLOROPHENOL	↓
2,4-DICHLOROPHENOL	↓	2,4-DINITROPHENOL	2480		

BASE NEUTRAL EXTRACTABLES IN (CHECK ONE) ( ) MICROGRAMS/LITER (✓) MILLIGRAMS/KILOGRAM:

NAME	AMT	NAME	AMT	NAME	AMT
N-NITROSO-N-DIETHYLAMINE	<120	ACENAPHTHYLENE	<120	FLUORANTHENE	40
bis-(2-CHLOROETHYL) ETHER	↓	DIMETHYL PHTHALATE	↓	PYRENE	2.1
1,3-DICHLOROBENZENE	↓	2,6-DINITROTOLUENE	↓	BENZIDINE	<120
1,4-DICHLOROBENZENE	↓	ACENAPHTHENE	27	DUTYLBENZYL PHTHALATE	↓
1,2-DICHLOROBENZENE	↓	2,4-DINITROTOLUENE	<120	BENZ(a)ANTHRACENE	↓
bis-(2-CHLOROISOPROPYL) ETHER	↓	FLUORENE	140	CHRYSENE	48
HEXACHLOROETHANE	↓	4-CHLOROPHENYL PHENYL ETHER	<120	3,3'-DICHLOROBENZIDINE	<120
N-NITROSO-DI-N-PROPYLAMINE	↓	DIETHYL PHTHALATE	↓	bis-(2-ETHYLHEXYL)PHTHALATE	↓
NITROBENZENE	↓	DIPHENYLAMINE	↓	DI-N-OCTYL PHTHALATE	↓
ISOPHORENE	↓	N-NITROSDIPHENYLAMINE	↓	BENZO(b)FLUORANTHENE	↓
bis-(2-CHLOROETHOXY)METHANE	↓	1,2-DIPHENYLHYDRAZINE	↓	BENZO(k)FLUORANTHENE	↓
1,2,4-TRICHLOROBENZENE	↓	4-ISOPROPENYL PHENYL ETHER	↓	BENZO(a)PYRENE	↓
NAPHTHALENE	170	HEXACHLOROBENZENE	↓	INDENO(1,2,3-cd)PYRENE	↓
HEXACHLOROBUTADIENE	<120	PHENANTHRENE	260	DIBENZO(a,h)ANTHRACENE	↓
HEXACHLOROCYCLOPENTADIENE	↓	ANTHRACENE	<120	BENZO(ghi)PERYLENE	↓
2-CHLORONAPHTHALENE	↓	DI-N-BUTYL PHTHALATE	↓		

PESTICIDES IN (CHECK ONE) ( ) MICROGRAMS/LITER (✓) MILLIGRAMS/KILOGRAM:

NAME	AMT	NAME	AMT	NAME	AMT
alpha-BHC	<340	ALDRIN	<340	beta-ENDOSULFAN	<480
gamma-BHC	↓	4-A'-DDE	↓	ENDOSULFAN SULFATE	↓
beta-BHC	↓	DIELDRIN	↓	ENDRIN	↓
delta-BHC	↓	4,4'-DDD	↓	alpha-ENDOSULFAN	↓
HEPTACHLOR	↓	4,4'-DDT	↓	HEPTACHLOR EPOXIDE	↓
ENDRIN ALDENYDE	↓				

VOLATILE ORGANICS IN (CHECK ONE) ( ) MICROGRAMS/LITER ( ) MILLIGRAMS/KILOGRAM:

NAME	AMT	NAME	AMT	NAME	AMT
CHLOROMETHANE	---	1,2-DICHLOROETHANE	---	1,1,2-TRICHLOROETHANE	---
BROMOMETHANE	---	CARBON TETRACHLORIDE	---	2-CHLOROETHYL VINYL ETHER	---
VINYL CHLORIDE	---	PERMETHYLCHLOROMETHANE	---	TRICHLOROETHYLENE	---
CHLOROETHANE	---	BENZENE	---	BROMOFORM	---
TRICHLOROFLUOROMETHANE	---	DIBROMOCHLOROMETHANE	---	TOLUENE	---
CHLOROFORM	---	1,1,1-TRICHLOROETHANE	---	ETHYL BENZENE	---
METHYLENE CHLORIDE	---	1,2-DICHLOROPROPANE	---	1,1,2,2-TETRACHLOROETHANE	---
1,1-DICHLOROETHYLENE	---	trans-1,3-DICHLOROPROPYLENE	---	TETRACHLOROETHYLENE	---
1,2-DICHLOROETHYLENE	---	cis-1,3-DICHLOROPROPYLENE	---	CHLOROBENZENE	---
trans-1,2-DICHLOROETHYLENE	---				

BY COMPARISON WITH EPA/NH MASS SPECTRAL LIBRARY  
IS PROVIDED, AND THE VALUES SHOULD BE REGARDED AS APPROXIMATE.

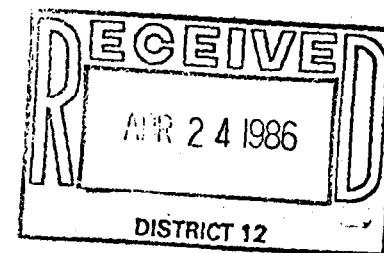
TENTATIVE  
COMPOUND  
IDENTIFICATION

APPROXIMATE CONCENTRATION  
AS D-10 ANTHRACENE  
( ) MICROGRAMS/LITER  
(✓) MILLIGRAMS/KILOGRAM

<del>decane</del> <sup>city</sup> nonadecane	<del>600</del> 1000
undecane	3100
tridecane	1500
tetradecane	2300
C <sub>3</sub> -phenol	2900
<del>pentadecane</del>	2800
hexadecane	2600
heptadecane	2000
octadecane	1200
1,1-(oxydiethylidene)bis benzene	1500
biphenyl	850
triethyl benzene	910

COMMENTS AND OTHER REQUESTED ANALYSES:

SAMPLE CONTAINS AN OIL C<sub>10</sub> to C<sub>30</sub>.



SIGNATURE

DATE

Richard L. Alford 4/14/86

NO. **SW** 04258

District 22 Org. No. 322 Work No. 3472 Lab. \_\_\_\_\_

Material Sampled: ☐ Solid waste (W); ☐ Liquid waste (L); ☒ Soil (E); ☐ Well (M);

☐ Stream (S); ☐ Other (O)

### Comments

1985

(continued on back)

Lab Only

APR 15 1988  
APR 14 1988

cmph

Analyst sign: *RAC*

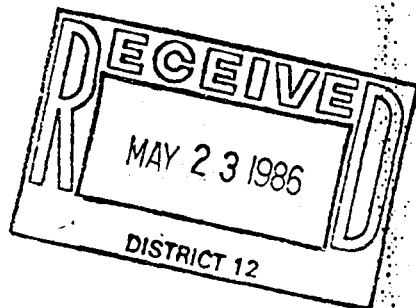
Preservation: ☒ None; ☐ Ice; ☐ H<sub>2</sub>SO<sub>4</sub>; ☐ HNO<sub>3</sub>  
☐ Other \_\_\_\_\_

Auxiliary Tags \_\_\_\_\_

☐ LEACHATE: \_\_\_\_\_ EP Toxicity Series: \_\_\_\_\_ TDWR

[illegible]

of Lion

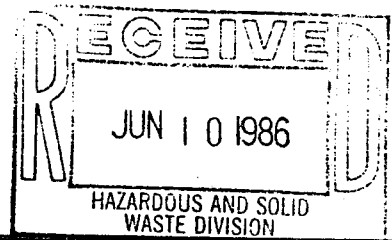


0.9 - 0.15



# Texas Water Commission

## INTEROFFICE MEMORANDUM



TO : Bill Brown, Field Operations Liaison  
Hazardous and Solid Waste Division  
THRU : Chip Volz, Manager, District 12  
FROM : Carlton H. Stanley, District 12  
SUBJECT: Falcon Refining (formerly Mid Gulf)  
Solid Waste Registration No. 31288

DATE: June 5, 1986

On March 12, 1986 I conducted an annual solid waste inspection of Falcon Refining. This facility has been inactive for several years. It was recently purchased by the original owners of the refinery. Prior to the reactivation, the refinery claimed a small quantity generator status.

This inspection revealed the following noncompliances:

1. Failure to update the Notice of Registration to reflect current waste generation and disposition; violation of Texas Administrative Code (TAC) 336.6 (a)(b).
2. Failure to deed record the on-site disposal of cooling tower sludge and general plant refuse; violation of TAC 336.5
3. Failure to make hazardous waste determinations on additional waste materials generated at the refinery; violation of TAC 336.62.
4. The imminent threat of discharge of industrial solid waste. The company disposed of cooling tower sludge with high levels of chromium on-site with no runoff controls provided; violation of TAC 336.4(1).

Bill Brown  
June 5, 1986  
Page 2

Pending hazardous waste determinations on the numerous drummed materials on-site, the company may be in violation of other Texas Water Commission solid waste regulations.

  
\_\_\_\_\_  
Carlton H. Stanley

CHS/af

Attachments

### GENERAL COMMENTS

This facility has been inactive for several years. It was recently purchased by the original owners of the refinery. The facility started up in late December 1985. Prior to the reactivation, the refinery claimed a small quantity generator status. The only hazardous wastes generated at the refinery were API separator sludge and DAF float. Spent caustic was tested for corrosive characteristics and did not exhibit hazardous characteristics. The only other wastes on the company's registration were crude oil tank bottoms and biological solids. It was noted during the inspection that other wastes have been generated - cooling tower sludge, lab wastes and drums of what appeared to be oil and other unknown materials. There have been no hazardous determinations conducted on these additional waste materials. There were approximately 50 drums located in various locations of the refinery. Approximately 30 drums contained material. (For location of drums see the attached refinery diagram.) Numerous drums are in various stages of deterioration. Four drums were tested with pH paper and exhibited a high pH (>11). There were 21 drums west of tank 31. There were numerous drums with bullet holes, and spilled material was noted in the surrounding area. Only four drums appeared to contain material. Two drums located several hundred yards further west were full and labeled "acetone". These drums were laying on their side. Additionally, when asked about the generation and disposition of cooling tower sludge, the refinery manager stated the cooling tower basin had been cleaned out and that sludge was "dumped on the ground".

No rainfall runoff controls are provided in that area. When asked about the use of chromium in the cooling towers, the plant manager said that to his knowledge none had ever been used. I collected a sample of the cooling tower sludge and had it analyzed for EP toxicity chromium and total chromium. The analysis indicated that the sludge is nonhazardous. However, total chromium was 8020 ppm.

Also observed and sampled was an oily sludge which had been dumped inside the fire walls of tank 13 (copy of Chain of Custody Tag attached). South of the cooling tower sludge disposal area there was a substantial quantity of what appeared to be general plant refuse, empty drums, plant trash, etc.

General Comments - continued

Pending waste determinations, the facility may not be eligible for the small quantity generator status and may be in violation of numerous Texas Administrative Code and 40 CFR regulations.

Additional Comments:

During December 1985 the refinery made a 100,000 barrels run of slop oil which generated a substantial amount of very odorous wastewater. The refinery's wastewater treatment system was inoperable during this run. The refinery placed untreated wastewater in tankage then ultimately discharged the untreated wastewater into sandy, unlined containment structures (fire walls). District 12 has requested central office enforcement action by the Water Quality Division for housekeeping and other wastewater violations.

# TEXAS WATER COMMISSION

Paul Hopkins, Chairman  
Ralph Roming, Commissioner  
John O. Houchins, Commissioner



Larry R. Soward, Executive Director  
Mary Ann Hefner, Chief Clerk  
James K. Rourke, Jr., General Counsel

June 5, 1986

Mr. Claude Richey  
Plant Manager  
Falcon Refining  
P. O. Drawer RR  
Ingleside, Texas 78363

Re: Solid Waste Registration No. 31288

Dear Mr. Richey:

On March 12, 1986 a representative from this office conducted an annual solid waste inspection at your facility. A copy of this report is attached. Your attention is invited to the cover memo indicating areas of noncompliance.

Please respond in writing to this office by July 7, 1986 of corrective measures planned or taken.

If you have any questions please contact Carlton H. Stanley at 512/882-2548 in Corpus Christi.

Yours truly,

A handwritten signature in black ink that reads "Chip Volz". The signature is stylized with a large, looped "C" and a long, sweeping "V".

Chip Volz  
District Manager  
District 12

CHS/af

Attachments